UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

EDWIN LEÓN,

Plaintiff,

Case No. 2:24-cv-01060-WB v.

NEHAMA HANOCH

And

CHEYENNE GOODMAN

Defendants.

STIPULATION AND ORDER FOR EXTENSION OF TIME

The parties stipulate as follows:

- On March 25, 2024, the Court conducted an Initial Pretrial Conference 1. with the parties. ECF No. 13.
- 2. At the Conference, counsel for Defendant Hanoch suggested that it would be worthwhile that—before Ms. Hanoch filed her motion to dismiss Plaintiff's First Amended Complaint—the parties should participate in a settlement conference with a Magistrate Judge.
- The current deadline for Ms. Hanoch to file her motion to dismiss is 3. May 24, 2024.
- 4. On May 10, 2024, the parties participated in a Zoom settlement conference with Magistrate Judge Lloret. ECF No. 22. Plaintiff and Ms. Hanoch made progress during this conference and Judge Lloret set (for those two parties

only, not Ms. Goodman) a follow up Zoom settlement conference for May 15 (ECF No. 25), during which Plaintiff and Ms. Hanoch made further progress. ECF No. 26.

- 5. Magistrate Judge Lloret has set one more Zoom Settlement Conference (for Plaintiff and Ms. Hanoch) for May 22, 2024. Plaintiff and Ms. Hanoch are close to a resolution and agree that by the end of the day on May 22 they will be able to report to the Court as to the status of their discussions.
- 6. Plaintiff and Ms. Hanoch agree that a resolution is more likely (and it would conserve resources) if Ms. Hanoch's deadline to respond to the First Amended Complaint is extended by two weeks (to June 7, 2024) so that Ms. Hanoch need not expend legal fees preparing that motion and brief while the parties are so close to a resolution.
 - 7. Ms. Goodman consents to this request.
- 8. The parties, therefore, stipulate and respectfully request that Ms. Hanoch's deadline to respond to the Complaint be extended to June 7, 2024. No further extensions of this deadline will be requested. A proposed order is attached to this Stipulation.

Dated: May 17, 2024

Respectfully submitted,

/s/ Neil M. Hilkert	/s/ Benjamin K. Jacobs
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SO ORDERED. BY THE COURT:

/s/Wendy Beetlestone, J.

The Honorable Wendy Beetlestone United States District Judge

DATE: 05/21/24